



Order Filed on August 2, 2023  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
Caption in Compliance with D.N.J. LBR 9004-1(b)**

20-10823 BKOBJ03  
BROCK & SCOTT, PLLC  
302 Fellowship Rd, Suite 130  
Mount Laurel, NJ 08054  
(844) 856-6646  
Attorneys for Santander Bank, N.A.

In Re:

Samuel K Tompoe  
Cecelia Tompoe

Case No: 18-17695-CMG

Hearing Date: July 5, 2023

Judge: CHRISTINE M.  
GRAVELLE

Chapter: 13

**CONSENT ORDER RESOLVING ARREARAGE AND CREDITOR'S  
CERTIFICATION OF DEFAULT**

The Consent Order set forth on the following pages, numbered two (2) through three (3) is hereby **ORDERED**

DATED: August 2, 2023

A handwritten signature in black ink, reading "Christine M. Gravelle", is written over a horizontal line.

Honorable Christine M. Gravelle  
United States Bankruptcy Judge

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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Chapter: 13

The Consent Order pertains to the property located at 66 Penwood Drive, Ewing, NJ 08618, mortgage account ending with "6431";

This Matter having been brought before the Court by Candyce Ilene Smith-Sklar, Esquire, attorney for Debtors, Samuel K Tompoe and Cecelia Tompoe (hereinafter the "Debtors"), upon the filing of a Modified Chapter 13 Plan, Santander Bank, N.A. (hereinafter the "Creditor") by and through its attorneys, Brock and Scott, PLLC, having filed a Certification of Default and the parties having subsequently resolved their differences; and the Court noting the consent of the parties of the form, substance and entry of the within Order, and for other and good cause shown:

1. The Parties agree that this Consent Order shall resolve Creditor's Certification of Default and shall be made part of the Confirmation Order.
2. The Debtors agree that they shall cure the full amount of the post-petition monthly mortgage payments currently in arrears, 3 payments for May 1, 2023 through July 1, 2023 in the amount of \$1,589.68 each, less \$1,560.64 in suspense funds, for a total of \$3,208.40.
3. The Debtors agree that they shall pay \$200.00 representing Attorney's Fees per the Post-Petition Fee Notice filed on May 3, 2021 through the remaining Chapter 13 Plan payments.
4. Furthermore, the Debtors agree that they shall pay \$200.00 in Attorney's Fees for the Creditor's currently pending Certification of Default.

5. The Debtors agree that a total of **\$3,608.40** in arrears shall be capitalized into the remaining Chapter 13 Plan payments.

6. If required by the Trustee, Debtors agree to amend their Chapter 13 Plan post-confirmation to provide for the arrears listed above.

7. The Debtors agree that beginning on August 1, 2023, regular monthly mortgage payments directly to Creditor in the amount of \$1,589.68 shall resume.

8. If the Debtors fail to make any regular monthly payment within thirty (30) days of the date it becomes due, then the Applicant may obtain an Order vacating, terminating, and/or annulling the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, a Certification specifying the Debtors' failure to comply with this Order. At the time the Certification is filed with the court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and the Debtors' attorney.

9. If the bankruptcy case is dismissed or converted, this Agreement is void and the instant bankruptcy case will not act to impose the automatic stay against the Applicant's opportunity to proceed against its Collateral without further Order of the Court.

10. This Order shall be incorporated in and become a part of any Order Confirming Plan in the herein matter.

The undersigned hereby consent to the form,  
Content and entry of the within Order:

BROCK AND SCOTT, PLLC

Santander Bank, N.A.

By Its Attorney,

/s/ Matthew Fissel

Matthew Fissel, Esquire

(Bar No. 038152012)

Attorney for Creditor

BROCK & SCOTT, PLLC

3825 Forrestgate Dr.

Winston-Salem, NC 27103

Telephone: 844-856-6646

Facsimile: 704-369-0760

E-Mail: [NJBKR@brockandscott.com](mailto:NJBKR@brockandscott.com)

Dated: July 31, 2023

DEBTORS

By Their Attorney,

/s/ Candyce Ilene Smith-Sklar

Candyce Ilene Smith-Sklar, Esquire

Attorney for Debtors

1901 North Olden Avenue,

Ewing Professional Park Suite 22,

Ewing, NJ 08618

Phone Number: (609) 882-9800

Fax: 609-538-1399

Email: [njpalaw@gmail.com](mailto:njpalaw@gmail.com)

Dated: 7/31/23

In re:  
Samuel K Tompoe  
Cecelia Tompoe  
Debtors

Case No. 18-17695-CMG  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0312-3  
Date Rcvd: Aug 03, 2023

User: admin  
Form ID: pdf903

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 05, 2023:

Recip ID	Recipient Name and Address
db/jdb	+ Samuel K Tompoe, Cecelia Tompoe, 66 Pennwood Drive, Trenton, NJ 08638-4716

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 05, 2023

Signature: /s/Gustava Winters

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## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 3, 2023 at the address(es) listed below:

Name	Email Address
Albert Russo	docs@russotrustee.com
Albert Russo	on behalf of Trustee Albert Russo docs@russotrustee.com
Andrew L. Spivack	on behalf of Creditor SANTANDER BANK N.A. andrew.spivack@brockandscott.com, wbecf@brockandscott.com
Candycy Ilene Smith-Sklar	on behalf of Joint Debtor Cecelia Tompoe njpalaw@gmail.com r56958@notify.bestcase.com
Candycy Ilene Smith-Sklar	on behalf of Debtor Samuel K Tompoe njpalaw@gmail.com r56958@notify.bestcase.com
Craig Scott Keiser	

District/off: 0312-3

User: admin

Page 2 of 2

Date Rcvd: Aug 03, 2023

Form ID: pdf903

Total Noticed: 1

on behalf of Creditor SANTANDER BANK N.A. craig.keiser@law.njoag.gov

Denise E. Carlon

on behalf of Creditor MIDFIRST BANK dcarlon@kmlawgroup.com bkgroup@kmlawgroup.com

Gary C. Zeitz

on behalf of Creditor Pro Cap 8 FBO Firsttrust Bank gzeit@zeitlawfirm.com  
rzeit@zeitlawfirm.com;cdillon@zeitlawfirm.com

John R. Morton, Jr.

on behalf of Creditor Santander Consumer USA Inc. ecfmail@mortoncraig.com mortoncraige@cf@gmail.com

John R. Morton, Jr.

on behalf of Creditor Santander Consumer USA Inc. dba Chrysler Capital ecfmail@mortoncraig.com mortoncraige@cf@gmail.com

Kevin Gordon McDonald

on behalf of Creditor MIDFIRST BANK kmcdonald@kmlawgroup.com bkgroup@kmlawgroup.com

Matthew K. Fissel

on behalf of Creditor SANTANDER BANK N.A. wbecf@brockandscott.com, matthew.fissel@brockandscott.com

Nicholas V. Rogers

on behalf of Creditor SANTANDER BANK N.A. FKA SOVEREIGN BANK, N.A. FKA SOVEREIGN BANK  
nj.bkecf@fedphe.com

Nicholas V. Rogers

on behalf of Creditor SANTANDER BANK N.A. nj.bkecf@fedphe.com

Robin I. London-Zeitz

on behalf of Creditor Pro Cap 8 FBO Firsttrust Bank rzeit@zeitlawfirm.com  
gzeit@zeitlawfirm.com;cdillon@zeitlawfirm.com;lfossi@zeitlawfirm.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 16